

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

CHERYL CIBULA PAYNE, : Case No: 20-30524
Debtor. : Chapter 13

OBJECTION TO CLAIM NUMBERED 8 FILED BY
GOLDMAN SACHS BANK USA

To the Honorable Keith Phillips, United States Bankruptcy Judge:

Now comes the Debtor in the above cause by her attorney of record, and moves this honorable court to disallow claim numbered 8 filed herein by Goldman Sachs Bank, USA, on the following grounds:

1. The deadline to file a Proof of Claim in this case for all creditors (except a governmental unit) was set for April 1, 2020.
2. The claim numbered 8 was filed by Goldman Sachs Bank USA, and/or John D. Sadler, Esq., after the deadline on April 9, 2020.

WHEREFORE, the Debtors pray that the Court disallow claim numbered 8 filed herein by Goldman Sachs Bank USA, and issue such other orders, processes, or judgments that are necessary or appropriate to carry out the provisions of Title 11.

CHERYL CIBULA PAYNE
By Counsel

Date: April 10, 2020

/s/James H. Wilson, Jr.

James H. Wilson, Jr.
Counsel for Debtor
VSB No: 27878
4860 Cox Road, Suite 200
Glen Allen, VA 23060
(804) 740-6464

NOTICE

Under Local Bankruptcy Rule 3007-1, unless a written response and a request for hearing on this objection are filed with the Clerk of the Court and served on the objecting party and the trustee within 30 days of the service of this objection, the Court may deem any opposition waived, treat the objection as conceded, and enter an order granting the requested relief without a hearing.

PROOF OF SERVICE

I certify that on April 10, 2020, I served a copy of the foregoing Objection on the parties listed below, by first-class mail, postage prepaid and/or by ECF:

United States Trustee
701 E. Broad Street, #4304
Richmond, VA 23219

Suzanne E. Wade, Chapter 13 Trustee
7202 Glen Forest Dr., Ste. 202
Richmond, VA 23226

John D. Sadler, Esq.
1909 K St. NW, 12th Flr.
Washington, DC 20006

Marcus by Goldman Sachs
Lockbox 6104, P.O. Box 7247
Philadelphia, PA 19170

/s/ James H. Wilson, Jr.

James H. Wilson, Jr., VSB No: 27878
Counsel for Debtor